

EXHIBIT 1

Douglas Handshoe

From: foodvacation Canada <foodvacation@gmail.com>
Sent: Tuesday, November 07, 2017 3:51 PM
To: Douglas Handshoe
Subject: Re: Handshoe v Perret et al - Rule 16 Order and Disclosures
Attachments: Gmail - update.pdf; Gmail - update_a.pdf; Gmail - update_b.pdf; Gmail - we have until midnight wednesday.pdf; Gmail - February visit.pdf

Flag Status: Flagged

Mr. Handshoe:

To further provide Initial Disclosure:

Attached find PDFs of emails relevant to the tortious interference claim. Also relevant are all docket items in the Slabbed New Media bankruptcy and case 12-cv-90, as well as your testimony on two occasions: once before the U.S. Trustee and once before the bankruptcy court. Also: Slabbed New Media filings in Louisiana's 24th Judicial District Court, and your affidavit filed with Nova Scotia Supreme Court in 2013. In addition, invoices and/or retainers for legal services from Purvis & Co., from Bob Wolford, and from the M.J. Barnett law firm will or may be relevant in determining damages for malicious prosecution and abuse of process.

Regarding "the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment", I am listing the following individuals:

1. G. Gerald Cruthird -- abuse of process & malicious prosecution; 11 U.S.C. 362(a) violation (non-privileged communications)
2. Anne-Marie Vandenweigh -- factual context & background of publishing activities targeting Leary, including infringement; existence of malice
3. Jennifer Handshoe -- abuse of process & malicious prosecution
4. Jack E. Truitt -- fraud & deceit, abuse of process; malicious prosecution; 11 U.S.C. 362(a) violation (non-privileged communications)
5. Stephen Gele -- fraud, fraud on the court
6. Randall Smith -- fraud, fraud on the court
7. Wayne S. Rideout -- harassment; 11 U.S.C. 362(a) violation
8. Milan Kubik -- tortious interference; 11 U.S.C. 362(a) violation
9. Henry Ward -- 362(a) violation
10. Sheila Cruthird -- abuse of process, malicious prosecution

Damages in terms of attorney's fees are in the range of \$38,000 to \$45,0000. I will also be seeking damages under 11 U.S.C. 362(k) for legal costs, emotional distress, and punitive damages.

Sincerely,

Charles Leary

On Mon, Oct 30, 2017 at 10:30 AM, foodvacation Canada <foodvacation@gmail.com> wrote:
Mr. Handshoe:

I have located emails related to the interference with business and contractual relation claim. I will get these to you shortly. I have to take out certain emails from the stream that are privileged.

Also, attached please find emails relevant to your counter notifications.

Finally, also attached are Copyright Assignments to me (one is scanned into 3 distinct pages).

I cannot agree that there is no relevant discovery related to my counterclaims.

Sincerely,

Charles Leary

On Fri, Oct 6, 2017 at 3:53 PM, Douglas Handshoe <earning04@gmail.com> wrote:

Mr. Leary:

In furtherance of the Court's order of 9/21/17 please be advised that I do not anticipate the need to submit a privilege log in this matter as the evidence is undisputed in the DMCA notice you sent to YouTube thus the issues to be decided are strictly a matter of law. The only third party I can think of which would have discoverable information would be YouTube.

I intend to seek nominal damages as well as compensatory damages in the amount of \$180,000.

Attached herewith is a PDF format case management order that must be submitted to the court. I filled in several of the data fields to get this process started. I am open to any changes you may make within reason.

Sincerely

Doug Handshoe

Slabbed New Media LLC

Post Office Box 788

Wiggins, MS 39577-0788

Phone: [\(228\) 284-0004](tel:(228)284-0004)

Fax: [\(601\) 928-5129](tel:(601)928-5129)

www.slabbbed.org